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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WILLIAM TERRELL, Guardian Ad Litem for
QUENTIN SLAGOWSKI, a minor, ANIKA
SLAGOWSKI, a minor, and ROWAN
SLAGOWSKI,

Plaintiffs,

vs.

CENTRAL WASHINGTON ASPHALT, INC.,
DONALD HANNON, JAMES WENTLAND,
JERRY GOLDSMITH and DOES 1 through 25,
inclusive,

Defendants.

AND ALL RELATED MATTERS.

CASE NO. 2:11-cv-00142-APG-VCF

CONSOLIDATED WITH:
CASE NO. 2:12-cv-01435-APG-VCF

CONSOLIDATED WITH:
CASE NO. 2:12-cv-01475-APG-VCF

**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEPOSITION DEADLINE
OF CENTRAL WASHINGTON ASPHALT, INC.'S PERSON MOST QUALIFIED**

Pursuant to LR 6-1 and LR 26-4, Plaintiffs WILLIAM TERRELL, Guardian Ad Litem for
QUENTIN SLAGOWSKI, a minor, ANIKA SLAGOWSKI, a minor, and ROWAN
SLAGOWSKI ("Plaintiffs") and Defendants Central Washington Asphalt, Inc. ("CWA"), Donald
Frank Hannon, James Wentland and Jerry Goldsmith (collectively, the "CWA Defendants")

1 by and through their respective attorneys of record, stipulate and agree as follows:

2 On February 25, 2015, this Honorable Court entered an Order (#400) regarding certain
3 discovery and the respective deadlines related thereto. Specifically, the deadline to complete
4 discovery regarding Plaintiffs' Cause of Action for Aiding and Abetting is June 5, 2015.

5 However, due to various scheduling issues and Plaintiffs' counsel's recent shoulder surgery, the
6 parties were unable to schedule the deposition of CWA's FRCP 30(b)(6) witnesses regarding
7 Plaintiffs' Cause of Action for Aiding and Abetting to take place prior to June 5, 2015.

8 Currently, the deposition of CWA's FRCP 30(b)(6) witnesses regarding the foregoing cause of
9 action is scheduled to take place on June 26, 2015 in Seattle, Washington.

10 Therefore, counsel for Plaintiffs and the CWA Defendants **STIPULATE AND AGREE**
11 **AS FOLLOWS:**

12 (1) The deadline for completion of CWA's FRCP 30(b)(6) witness' deposition
13 regarding Plaintiffs' cause of action for aiding-and-abetting shall be extended to June 30, 2015.

14 (2) But for the deposition of CWA's FRCP 30(b)(6) witness as set forth above, the
15 June 5, 2015 aiding-and-abetting discovery cutoff date stands.

16 Dated this 20th day of May, 2015

Dated this 20th day of May, 2015

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8
9 **[Proposed] ORDER**

10 **IT IS SO ORDERED.**

11 

12 ~~UNITED STATES DISTRICT COURT~~
13 MAGISTRATE

14 Dated: May 21, 2015